# FINAL ADMINISTRATIVE DECISION
# ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Third Gold Investment, LLC
DOCKET NO.: 24-49514.001-R-1
PARCEL NO.: 17-28-212-004-0000

The parties of record before the Property Tax Appeal Board are Third Gold Investment, LLC, the appellant, by attorney Michael R. O'Malley, of Schmidt Salzman & Moran, Ltd. in Chicago; and the Cook County Board of Review.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds ***No Change*** in the assessment of the property as established by the **Cook** County Board of Review is warranted. The correct assessed valuation of the property is:

| | |
|---|---|
| **LAND:** | $17,031 |
| **IMPR.:** | $60,068 |
| **TOTAL:** | $77,099 |

Subject only to the State multiplier as applicable.

## Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the Cook County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2024 tax year. The Property Tax Appeal Board finds that it has jurisdiction over the parties and the subject matter of the appeal.

## Findings of Fact

The subject property consists of a 2-story, multi-family building of masonry exterior construction with 4,513 square feet of gross building area. The building is approximately 65 years old and features include a full basement finished with an apartment.[1] The property has a 3,125 square foot site and is located in Chicago, South Chicago Township, Cook County. The subject is classified as a class 2-11 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends assessment inequity with respect to the improvement as the basis of the appeal. In support of this argument, the appellant submitted information on five equity comparables located within the subject's assessment neighborhood, along with property

[1] The board of review disclosed the subject has a full basement finished with an apartment, which was unrefuted by the appellant.

characteristic sheets that were used by the Board to verify, add, or correct some data in the grid analysis. The comparables are improved with 2-story or 3-story, class 2-11 multi-family buildings of frame or masonry exterior construction ranging in size from 4,092 to 4,908 square feet of gross building area. The buildings range in age from 97 to 136 years old. Each comparable has a full basement and four comparables each have a 2-car or a 2.5-car garage. The comparables have improvement assessments ranging from $36,300 to $42,562 or from $7.43 to $9.02 per square foot of gross building area. Based on this evidence, the appellant requested that the subject's improvement assessment be reduced to $40,030.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of $77,099. The subject property has an improvement assessment of $60,068 or $13.31 per square foot of gross building area.

In support of its contention of the correct assessment, the board of review submitted information on four comparables with the subject's assessment neighborhood. The comparables are improved with 2-story or 3-story, class 2-11 multi-family buildings of masonry exterior construction ranging in size from 3,302 to 3,966 square feet of gross building area. The buildings range in age from 6 to 100 years old. Each comparable has a full basement, three of which are finished with an apartment or formal recreation room, and central air conditioning. One comparable has two fireplaces. Three comparables each have a 2-car garage. The comparables have improvement assessments ranging from $52,969 to $68,105 or from $15.33 to $18.58 per square foot of gross building area. Based on this evidence, the board of review requested the subject's assessment be confirmed.

## Conclusion of Law

The appellant contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). The Board finds the appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted nine suggested comparables for the Board's consideration. The Board finds none of the parties' comparables are truly similar to the subject due to varying degrees of similarity to the subject in age and other property characteristics. Nevertheless, the appellant's comparables #3 and #4, as well as the board of review comparables, were accorded diminished weight due to substantial disparities relative to the subject in design/class, dwelling size, and/or central air conditioning amenity. Each of these comparables is a substantially older home than the subject suggesting upward adjustments for this difference would be required to make them more equivalent to the subject. Conversely, the appellant's comparables #2 and #5 each have a garage amenity which would necessitate downward adjustments for this difference for equivalency to the subject. The best comparables have improvement assessments ranging from $36,466 to $41,288 or from $7.43 to $9.02 per square foot of gross building area. The subject's improvement assessment of $60,068 or $13.31 per square foot of gross building area falls above

the range established by the best comparables in this record. However, based on the evidence in this record and after considering adjustments to the best comparables for differences when compared to the subject, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment is not justified.

This is a final administrative decision of the Property Tax Appeal Board which is subject to review in the Circuit Court or Appellate Court under the provisions of the Administrative Review Law (735 ILCS 5/3-101 et seq.) and section 16-195 of the Property Tax Code. Pursuant to Section 1910.50(d) of the rules of the Property Tax Appeal Board (86 Ill.Admin.Code §1910.50(d)) the proceeding before the Property Tax Appeal Board is terminated when the decision is rendered. The Property Tax Appeal Board does not require any motion or request for reconsideration.

Chairman

Member

Member

Member

Member

DISSENTING:

C E R T I F I C A T I O N

As Clerk of the Illinois Property Tax Appeal Board and the keeper of the Records thereof, I do hereby certify that the foregoing is a true, full and complete Final Administrative Decision of the Illinois Property Tax Appeal Board issued this date in the above entitled appeal, now of record in this said office.

Date: November 17, 2026

Clerk of the Property Tax Appeal Board

**IMPORTANT NOTICE**

Section 16-185 of the Property Tax Code provides in part:

"If the Property Tax Appeal Board renders a decision lowering the assessment of a particular parcel after the deadline for filing complaints with the Board of Review or after adjournment of the session of the Board of Review at which assessments for the subsequent year or years of the same general assessment period, as provided in Sections 9-215 through 9-225, are being considered, the taxpayer may, within 30 days after the date of written notice of the Property Tax Appeal Board's decision, appeal the assessment for such subsequent year or years directly to the Property Tax Appeal Board."

In order to comply with the above provision, YOU MUST FILE A PETITION AND EVIDENCE WITH THE PROPERTY TAX APPEAL BOARD WITHIN 30 DAYS OF THE DATE OF THE ENCLOSED DECISION IN ORDER TO APPEAL THE ASSESSMENT OF THE PROPERTY FOR THE SUBSEQUENT YEAR OR YEARS. A separate petition and evidence must be filed for each of the remaining years of the general assessment period.

Based upon the issuance of a lowered assessment by the Property Tax Appeal Board, the refund of paid property taxes is the responsibility of your County Treasurer. Please contact that office with any questions you may have regarding the refund of paid property taxes.

PARTIES OF RECORD

AGENCY

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Third Gold Investment, LLC, by attorney:
Michael R. O'Malley
Schmidt Salzman & Moran, Ltd.
111 West Washington St.
Suite 1300
Chicago, IL 60602

COUNTY

Cook County Board of Review
County Building, Room 601
118 North Clark Street
Chicago, IL 60602